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11 **HIDDEN EMPIRE HOLDINGS, LLC,**
12 **HYPER ENGINE, LLC, AND DEON**
13 **TAYLOR;** and Third-Party Defendant
14 **ROXANNE TAYLOR**

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

17 HIDDEN EMPIRE HOLDINGS,
18 LLC; a Delaware limited liability
19 company; HYPER ENGINE, LLC; a
20 California limited liability company;
21 DEON TAYLOR, an individual,

22 Plaintiffs,

23 vs.

24 DARRICK ANGELONE, an
25 individual; AONE CREATIVE LLC,
26 formerly known as AONEE
27 ENTERTAINMENT LLC, a Florida
28 limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Defendants.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,
formerly known as AONE

Case No. 2:22-cv-06515-MWF-AGR

The Hon. Michael W. Fitzgerald

**PLAINTIFFS' OPPOSITION TO
DEFENDANT'S EX PARTE
APPLICATION TO CONTINUE
BRIEFING DEADLINES ON
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT;
DECLARATION OF FELTON T.
NEWELL**



1 ENTERTAINMENT LLC, a Florida
2 limited liability company; ON
3 CHAIN INNOVATIONS LLC, a
4 Florida limited liability company

5 Counterclaimants,

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7 HIDDEN EMPIRE HOLDINGS,
8 LLC; a Delaware limited liability
9 company; HYPERENGINE, LLC; a
10 California limited liability company,
11 DEON TAYLOR, an individual,

12 Counterclaim
13 Defendants,

14 DARRICK ANGELONE, an
15 individual; AONE CREATIVE LLC,
16 formerly known as AONE
17 ENTERTAINMENT LLC, a Florida
18 limited liability company; ON
19 CHAIN INNOVATIONS LLC, a
20 Florida limited liability company,

21 Third-Party Plaintiffs

22 v.

23 ROXANNE TAYLOR, an
24 individual, Third-Party Defendant
25
26
27
28



1 **I. INTRODUCTION**

2 The Court should deny Defendants' Ex Parte Application for two reasons –
3 1) Defendants have already received 42 extra days to prepare their opposition to
4 Plaintiffs' Motion for Summary Judgment, and 2) Defendants failed to act with
5 diligence securing a declaration from their expert witness.

6 On June 10, 2025, Plaintiffs filed their Motion for Summary Judgment.
7 After Defendants filed an ex parte application seeking a continuance of the
8 deadline for filing their opposition, the court encouraged the parties to meet and
9 confer regarding a continued date. The parties agreed to continue the hearing
10 date for the motion by 42 days.

11 In addition, Defendants failed to act with diligence in securing a
12 declaration from their expert witness. In the Declaration of JT Fox filed in
13 support of Defendants' ex parte application, Mr. Fox admitted that while he was
14 served with the Motion for Summary Judgment on June 10, 2025, he did not
15 forward the motion to his expert until June 24, 2025. In fact, if Defendants had
16 acted with diligence and contacted their expert earlier, they would have known
17 about their expert's unavailability on June 18, 2024, when they filed their initial
18 ex parte application seeking additional time. The Court should not reward
19 Defendants for their lack of diligence. The Court should deny Defendants' ex
20 parte application.

21 **II. FACTS**

22 On June 10, 2025, Plaintiffs filed a Motion for Summary Judgment (the
23 "Motion"). Declaration of Felton T. Newell ("Newell Decl.") ¶ 2. On June 18,
24 2025, Defendants filed an ex parte application seeking a continuance of the
25 hearing date for the Motion. *Id.* After the Court ordered the parties to meet and
26 confer regarding a continued hearing date, the parties stipulated that the hearing
27 date would be continued from July 7, 2025 to August 18, 2025, giving
28 Defendants 42 additional days to prepare their opposition to the Motion. *Id.* On



July 17, 2025, Plaintiffs filed a second ex parte application seeking a further continuance to prepare their opposition to the Motion. *Id.*

III. ARGUMENT

A. The Court Should Deny Defendants' Ex Parte Application as Defendants Have Not Acted with Diligence

The Court should deny Defendants ex parte application since Defendants have failed to act with diligence. As a result of the Court's previous order requiring the parties to meet and confer regarding a continuance, Defendants have already received 42 extra days to prepare their opposition to the Motion. Nonetheless, Defendants waited 14 days between first receiving the Motion and sending the Motion to their expert. The Court should not reward Defendants' lack of diligence by again giving Defendants additional time to prepare its opposition.

IV. CONCLUSION

For the foregoing reasons, the Court should deny Defendants' Ex Parte Application to Continue Briefing Deadlines on Plaintiff's Motion for Summary Judgment.

Dated: July 18, 2025

NEWELL LAW GROUP PC

/s/ Felton T. Newell

Attorneys for Plaintiffs and Counter-
Claim Defendants HIDDEN EMPIRE
HOLDINGS, LLC; HYPER ENGINE,
LLC AND DEON TAYLOR; AND
Third-Party Defendant ROXANNE
TAYLOR



DECLARATION OF FELTON T. NEWELL

I, FELTON T. NEWELL, hereby declare as follows:

1. I am a partner at Newell Law Group P.C., counsel of record for Plaintiffs Hidden Empire Holdings, LLC, Hyper Engine, LLC and Deon Taylor and Defendant Roxanne Taylor in this action. Each of the facts contained in this declaration is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. On June 10, 2025, Plaintiffs filed a Motion for Summary Judgment (the "Motion"). On June 18, 2025, Defendants filed an ex parte application seeking a continuance of the hearing date for the Motion. After the Court ordered the parties to meet and confer regarding a continued hearing date, the parties stipulated that the hearing date would be continued from July 7, 2025 to August 18, 2025, giving Defendants 42 additional days to prepare their opposition to the Motion. On July 17, 2025, Plaintiffs filed a second ex parte application seeking a further continuance to prepare their opposition to the Motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of July 2025, at Los Angeles, California.



